

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**UNITED STATES OF AMERICA, }
Plaintiff, }
} v. } Case No. 2:08-cr-0008-SRW
} ANDREW D'ANGELO GARRETT, }
Defendant.**

**DEFENDANT'S REQUEST TO EXTEND TIME TO FILE MOTION PURSUANT
TO RULE 11(c) FEDERAL RULES OF CRIMINAL PROCEDURE**

COMES NOW, Andrew D'Angelo Garrett, by and through his attorney of record, Michael L. Kidd, hereby respectfully request that the time be extended to file Notice of Intent to enter into a plea agreement pursuant to Rule 11(c) Federal Rules of Criminal Procedure. In support of said motion the Defendant would offer the following:

1. Undersigned counsel left the continental United States to travel to Petersburg Alaska on or about June 5th, 2008 where he remained until June 13th, 2008.
2. Prior to leaving for said trip, undersigned counsel had been in negotiations with the government where a potential plea arrangement in the above cause had been discussed.
3. Once undersigned counsel was provided with a proposed plea agreement, undersigned counsel attempted to file notice of intent to enter into a plea agreement pursuant to Rule 11(c) Federal Rules of Criminal Procedure prior to June 11, 2008, but was unsuccessful due to complications in filing said motion from a remote location in Alaska.

WHEREFORE in the interest of justice the Defendant respectfully request that time be extended to allow the defendant to enter into a plea agreement pursuant to Rule 11(c) of the Federal Rules of Criminal Procedure.

Respectfully submitted on this the 17th day of June, 2008.

S/ Michael L. Kidd

MICHAEL L. KIDD (KID001)

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CERTIFICATE OF SERVICE

I hereby certify that on June 17th, 2008, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Chris Snyder
United States Attorney
Post Office Box 197
Montgomery, AL 36101

s/ Michael L. Kidd

of COUNSEL